

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 12-md-2323(AB)

MDL No. 2323

**Opt-Out Plaintiffs' Second Amended  
Master Administrative Long-Form  
Complaint and (if applicable)  
Sweet, et al. v. National Football  
League [et al.], No. 12-CV-7214**

SHORT FORM COMPLAINT

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

JURY TRIAL DEMANDED

---

**NOTICE OF WITHDRAWAL OF OPT OUT PLAINTIFF PAUL FLATLEY SHORT FORM  
COMPLAINT AGAINST NFL DEFENDANTS**

1. WHEREAS Plaintiff, Paul Flatley and Plaintiff's Spouse \_\_\_\_\_ submit this Notice of Withdrawal in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.
2. WHEREAS on July 14, 2014, Plaintiff submitted an Opt Out Short Form Complaint Against NFL Defendants in accordance with the Court's April 12, 2017 order.
3. WHEREAS in his Opt Out Short Form Complaint Against NFL Defendants, Plaintiff reserved any and all rights and relief to request to revoke his opt out from the settlement class in order to participate in the settlement. *See generally* Plaintiff's Opt Out Short Form Complaint Against NFL Defendants at n.1.
3. WHEREAS Plaintiff submitted a Request to Revoke Opt-Out, which the Court accepted, permitting Plaintiff to revoke his opt out and establishing Plaintiff as a settlement class member.
4. NOW THEREFORE Plaintiffs are withdrawing the short form complaint filed on July 14, 2017 as Plaintiff is no longer an opt-out to the litigation.

Dated: August 1, 2017

Respectfully submitted,

By: /s/ Robert A. Stein  
ROBERT A. STEIN  
2313 Cedar Shore Drive  
Minneapolis, MN 55416  
Tel: (612) 886-3582  
Email: rastein66@aol.com

By: /s/ Daniel J. Kurowski  
Daniel J. Kurowski  
HAGENS BERMAN SOBOL SHAPIRO LLP  
455 N. Cityfront Plaza Drive, Suite 2410  
Chicago, IL 60611  
Phone: (708) 628-4963  
Fax: (708) 628-4963  
Email: dank@hbsslaw.com

Steve W. Berman  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Tel: (206) 623-7292  
Fax: (206) 623-0594  
Email: steve@hbsslaw.com

*Attorneys for Plaintiff*